



AUMA Submission
Coal Policy Committee



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About AUMA

The Alberta Urban Municipalities Association (AUMA) represents urban municipalities, including cities, towns, villages, summer villages and specialized municipalities – where over 85 percent of Albertans live. At AUMA, we work to ensure that everyone – at every level of government – understands that municipal governments are accountable to their citizens and are trusted to act in the best interests of their respective communities. Municipal leaders function in close proximity to Alberta's citizens, which helps make municipalities the most transparent order of government.

Municipal governments are intrinsically involved in the everyday lives of the people they serve. They guide and oversee the issues, programs, services that most directly impact the day-to-day lives of their citizens. Municipal leaders have long understood the importance of working with every level of government to attract industries, make life easier for businesses, and seek new ways to serve Albertans better.

Our Recommendations

AUMA appreciated the opportunity to meet with the Coal Policy Committee on July 5, 2021. Our productive dialogue with the committee members encouraged us to provide this written submission. The following are three high-level recommendations that we believe the Government of Alberta needs to consider when developing a coal policy.

(A) MUNICIPALITIES NEED TO BE PART OF THE DISCUSSION

Our diverse membership means that there are various opinions about coal development in Alberta. Our members overwhelmingly support economic development. Creating jobs, building a business-friendly environment locally and promoting Alberta as a destination for investment, tourism, and recreation are the focus of every municipal council.

Municipal priorities such as economic development, land use, water supply and quality and municipal infrastructure are all influenced by coal development. Coal developments often have local, regional, or even provincial impacts. For example, a growing population means higher demand for schools, housing, traffic, recreation, water, and wastewater treatment facilities. Municipalities provide services to mining companies and their employees. Projects cannot be successful without municipal services that include safe, affordable, and high-quality drinking water.

Municipal leaders understand local perspectives and can provide unique insight on creating local jobs while protecting our environment. As per the *Municipal Government Act*, municipalities must develop Public Participation Policies that identify when and how municipalities approach public participation and engagement. We believe municipal leaders' engagement experience can help the province and project proponents, as municipal leaders have a lot of experience in this area.

Municipalities want to have the opportunity to be part of this discussion at different stages – site selection, environmental assessment, and permit approval, etc. – to ensure that municipalities understand the project and provide support when necessary. There are many mining companies already doing this on their own with a community liaison position. But we feel consulting and engaging local governments should be required.

(B) ALBERTA NEEDS TO MOVE FORWARD WITH THE LAND-USE FRAMEWORK

In response to Alberta's economic growth, the Alberta government started a comprehensive initiative to develop new land-use planning for the province. In 2008, the provincial government launched the Land-Use Framework (LUF) to manage lands and natural resources better and monitor the cumulative effect of development.

The framework is designed to ensure proper stewardship of Alberta's lands and resources so that future generations of Albertans will benefit from our natural beauty and prosperity. The LUF provides a blueprint for land-use management and decision-making to address Alberta's growth pressures. It is about better managing our growth, not stopping it.

Despite early momentum, progress on implementing the land use framework appears to have slowed and, along with it, the province's commitment to integrated regional planning and cumulative impacts management. The LUF outlined six land-use regions, but only two regions have a land-use plan. Even these plans do not provide the necessary framework for avoiding and better managing disputes among different users of the land.

AUMA supports the concept and goals of the land use framework. We recognize the need for the province to engage municipalities and other stakeholders when making essential decisions about strategically coordinating land uses. We encourage the government to continue to move forward with the land use framework and the principles that support it when determining the long-term coal policy. The LUF needs to be reinvigorated through engagement with municipalities and integrated into coal policy development and future mining projects.

(C) WATER MUST BE PART OF THIS DISCUSSION

AUMA believes that water management must be considered when developing the coal policy. Alberta often develops policies in a silo and only considers short-term gains instead of taking a long-term and comprehensive perspective. This short-term thinking has led to brownfields in every municipality and orphaned and abandoned gas and oil wells throughout the province. We must do better.

Alberta has the coal deposits to help meet global demand, but we should not sacrifice our water quality and risk massive environmental liabilities to meet this demand. The potential financial gains must be weighed against the economic and societal risks of decreased water quality. The true Alberta Advantage is our water. Albertans want clean drinking water, and they expect they will have clean drinking water for future generations. Water is the foundation of life, and we need to protect our water.

Municipalities are the owners and operators of water infrastructure. Any impact on the freshwater resources will affect downstream communities, impacting municipal operations and residents' drinking water quality. The industry needs to be responsible for testing and prevention measures to ensure that all downstream water users are not impacted. Provincial and federal regulators also need to ensure that the industry has emergency plans for mining accidents that inevitably impact water quality – the industry must also be responsible for mitigation and clean-up costs.

Municipalities are responsible when residents have a drinking water crisis. Water is a limited resource that all Albertans rely on and requires careful management and allocation. Protecting watersheds and ensuring safe drinking water for Albertans must be a priority in this discussion. AUMA believes that water management must be considered as part of developing coal policy. We ask the committee to highlight this to the Minister of Energy.

Conclusion

In closing, we would like to reinforce that coal development and its positive and negative impacts matter to Alberta municipalities. Our voices need to be considered in crafting the long-term coal policy. Our recommendations focus on dialogue with local leaders, building relationships and partnerships. Municipalities have responsibilities and interests ranging from water supply and quality to land use to economic development and tourism. We ask that these priorities be considered in your report to the Minister.